

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 270, 496, 509, 510, 511, 512, 533

NOTICE OF REVISED PROPOSED ORDER

PLEASE TAKE NOTICE that, on November 11, 2022 and November 14, 2022, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on December 21, 2022, the Debtors filed the *Debtors’ Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-In-Possession Nunc Pro Tunc to the Petition Date* [D.I. 270] (the “S&C Retention Application”).

PLEASE TAKE FURTHER NOTICE that, on January 13, 2023, the Office of the United States Trustee (the “U.S. Trustee”) filed the *Objection of the United States Trustee to Debtors Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date* [D.I. 496].

PLEASE TAKE FURTHER NOTICE that, on January 17, 2023, the Debtors filed the *Debtors’ Omnibus Reply in Support of Debtors’ Retention Applications* [D.I. 509], the *Supplemental Declaration of Andrew G. Dietderich in Support of Debtors’ Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-In-Possession Nunc Pro Tunc to the Petition Date* [D.I. 510], the *Supplemental Declaration of John J. Ray III in Support of Debtors’ Applications for Orders Authorizing the Retention and Employment of Sullivan & Cromwell LLP, Alix Partners LLP and Quinn Emanuel Urquhart & Sullivan, LLP* [D.I. 511], and the *Declaration of Alexa J. Kranzley in Support of Debtors’ Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-In-Possession Nunc Pro Tunc to the Petition Date* [D.I. 512].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

PLEASE TAKE FURTHER NOTICE that, on January 19, 2023, the Debtors filed the *Second Supplemental Declaration of Andrew G. Dietderich in Support of Debtors' Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-In-Possession Nunc Pro Tunc to the Petition Date* [D.I. 533].

PLEASE TAKE FURTHER NOTICE that the Debtors have revised the proposed form of order to the S&C Retention Application (the "Revised S&C Retention Order"), a copy of which is attached hereto as **Exhibit A**. The U.S. Trustee has reviewed and approved the Revised S&C Retention Order. A copy of the Revised S&C Retention Order compared against the proposed order attached to the S&C Retention Application is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that copies of the above-referenced documents and other pleadings filed in the above-captioned Chapter 11 Cases may be obtained free of charge from the website maintained by the Debtors' noticing and claims agent at <https://cases.ra.kroll.com/FTX>. You may also obtain copies from the Court's website at www.deb.uscourts.gov for a fee.

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Dated: January 19, 2023
Wilmington, Delaware

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/s/ Matthew R. Pierce

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